

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

V.

Civil Action No. 3:14-cv-852

VIRGINIA STATE BOARD OF
ELECTIONS, *et al.*,

Defendants,

NOTICE OF CORRECTION TO BRIEF OF INTERESTED PARTY
VIRGINIA STATE CONFERENCE OF NAACP BRANCHES

Interested Party Virginia State Conference of NAACP Branches (“the Virginia NAACP”), by and through its undersigned counsel, respectfully notifies the Court of a correction to the Brief in Support of the Proposed Legislative Redistricting Plan Submitted by the Virginia State Conference of NAACP Branches (Dkt. 286), which was filed on November 2, 2018 in connection with the Virginia House of Delegates remedial redistricting process.

As noted in its brief and shown in the supporting maps, the Virginia NAACP submitted a proposed remedial plan that it believed, based on incumbent address information it could locate, did not pair any incumbents. *See* Dkt. 286 at 9-10; *see also* Dkt. 286-3 to 286-18. However, the Virginia NAACP recently became aware of the fact that its proposed remedial plan utilized the name and address of the former delegate for District 73, John M. O'Bannon III, and not that of the current delegate, Debra H. Rodman, who was elected in 2017. The consequence of this error is

that the Virginia NAACP proposed remedial plan places two incumbents, Delegate Rodman and Delegate Schuyler T. VanValkenburg, within the bounds of District 72.¹ Accordingly, to the best of Virginia NAACP's knowledge based on incumbent address information now known, the Virginia NAACP proposed remedial plan has one instance of paired incumbents.

The Virginia NAACP respectfully requests that the Court take note of this correction.

Submitted this 15th day of November, 2018.

/s/ David O. Prince

David O. Prince (VA State Bar # 17044)
411 East Franklin Street
Richmond, VA 23219
Telephone: 804-873-2601
Email: princelaw@aol.com

Allison Riggs (admitted *pro hac vice*)
Jeff Loperfido (admitted *pro hac vice*)
SOUTHERN COALITION FOR SOCIAL JUSTICE
1415 W. Highway 54, Suite 101
Durham, N.C. 27707
Telephone: (919) 323-3380
Facsimile: (919) 323-3942
Email: allisonriggs@southerncoalition.org
Email: jeffloperfido@scsj.org

Counsel for the Virginia NAACP

¹ Districts 72 and 73 are not one of the eleven challenged districts and are not one of the five districts identified as potential influence districts for African-American voters in the Virginia NAACP plan (Dkt. 286 at 22-25).

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November, 2018, I have electronically filed the foregoing document with the Clerk of Court using the United States District Court, Eastern District of Virginia, Richmond Division, CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record, including Plaintiffs, Defendants, and Defendant-Intervenors.

/s/ David O. Prince
David. O. Prince, Esquire
VSB # 17044
411 East Franklin Street
Richmond, VA 23219
804-788-4861
princelaw@aol.com